

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Cr. No.: 1:19-cr-10040-JDB
)	
vs.)	
)	
JEFFREY YOUNG)	
ALEXANDER ALPEROVICH, M.D. AND)	
ANDREW RUDIN, M.D.)	
)	
Defendants.)	

GOVERNMENT’S NOTICE OF EXPERT DISCLOSURE

The Government, through the undersigned counsel, hereby provides the Court notice as follows:

Yesterday, on April 14, 2020, the government provided counsel for all Defendants its Notice of Expert Testimony attached hereto as Exhibit A¹ in accordance with this Court’s scheduling order. In addition to Exhibit A, the government provided the Defendants (through counsel) additional materials, including curricula vitarum explaining expert qualifications, prior testimony and statements of proposed experts, and expert reports currently in the government’s possession. Those additional materials are not attached here, but were provided electronically to the defense.

¹ Exhibit A is redacted to protect patient privacy, but counsel was provided with an unredacted version.

The government reserves its right to produce additional materials required by the Jencks Act or *Giglio* materials at an appropriate time prior to trial.

Respectfully submitted,

/s/ Katherine Payerle
Katherine Payerle
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed through ECF on April 15, 2020.

/s/ Katherine Payerle
Katherine Payerle
Assistant Chief